

1 Tamela L. Kahle
2 Nevada Bar No. 0558
3 John L. Ward IV
4 Nevada Bar No. 12513
5 **KAHLE & ASSOCIATES**
6 7660 West Sahara Avenue, Ste. 110
7 Las Vegas, Nevada 89117
8 Telephone (702) 453-2200
9 Facsimile (702) 453-2201

10 Attorneys for Defendant
11 The Vons Companies, Inc.

12 and

13 Bryan Boyack
14 Nevada Bar No. 9980
15 **RICHARD HARRIS LAW FIRM**
16 801 South 4th St.
17 Las Vegas, Nevada 89101
18 Telephone (702) 444-4444
19 Fax (702) 444-4455

20 Attorney for Plaintiff
21 Desiree Dipuzo

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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

18 DESIREE DIPUZO,

19 Plaintiff,

20 vs.

21 THE VONS COMPANIES, INC.; DOES I
22 through X; and ROE CORPORATIONS XI
through XX, inclusive,

23 Defendants.

24 CASE NO.: 2:12-cv-01498-LRH-CWH

25 **JOINT MOTION TO CONTINUE EARLY**
NEUTRAL EVALUATION CONFERENCE
(First Request)

26 **JOINT MOTION TO CONTINUE EARLY NEUTRAL EVALUATION CONFERENCE**

27 Plaintiff Desiree Dipuzo, by and through her counsel, Bryan A. Boyack, Esq. of The
28 Richard Harris Law Firm and Defendant The Vons Companies, Inc., by and through its counsel,
Tamela L. Kahle, Esq. of Kahle & Associates hereby submit their *Joint Motion to Continue Early*
Neutral Evaluation Conference for the cause shown herein and pursuant to LR 16-6(d).

1 I. CAUSE FOR CONTINUANCE OF ENE CONFERENCE

2 Certain documents Plaintiff requested required a Protective Order before being produced.
3 Now that the Protective Order has been filed, Defendant is gathering the documents. Plaintiff
4 believes these documents are pertinent in litigating her claim. Moreover, Plaintiff intends to take
5 a deposition of the Person Most Knowledgeable for Vons. Lastly, Plaintiff intends to take the
6 deposition of Plaintiff's treating physician, Gary LaTourette, M.D. Taking his deposition has
7 been difficult due to scheduling conflicts.

8 On January 31, 2013, Honorable Magistrate Judge Carl W. Hoffman granted the Parties'
9 *Stipulation to Extend Discovery Deadline* for the cause listed *supra*. Pursuant to LR 16-6(d), the
10 Parties now jointly move for the continuation of the Early Neutral Evaluation Conference
11 currently scheduled for February 19, 2013, until after the required depositions of the Person Most
12 Knowledgeable for Vons, and Plaintiff's treating physician, Gary LaTourette, M.D. are taken.

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1 Plaintiff is currently attempting to schedule said depositions and anticipates they will be taken by
2 mid-March 2013.

3 Submitted by the Parties:

4 Dated this 5th day of February, 2013.

5 RICHARD HARRIS LAW FIRM

6 Dated this 5th day of February, 2013

7 KAHLE & ASSOCIATES

8 */s/ Bryan A. Boyack.*

9 By:

10 Bryan A. Boyack, Esq.
Nevada Bar No. 9980
801 South 4th St.
Las Vegas, Nevada 89101
11 Attorney for Plaintiff
Desiree Dipuzo

12 */s/ Tamela L. Kahle*

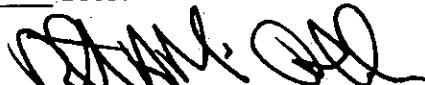
13 By:

14 Tamela L. Kahle, Esq.
Nevada Bar No. 0558
7660 W. Sahara Ave., Ste. 110
Las Vegas, Nevada 89117
15 Attorney for Defendant
The Vons Companies, Inc.

16 ORDER

17 IT IS SO ORDERED. The Early Neutral Evaluation Conference currently scheduled for
18 February 19, 2013, for cause shown and pursuant to LR 16-6(d), is now continued to the 16th
19 day of April, 2013. at 9:00 am

20 DATED this 12th day of February, 2013.

21 
22 UNITED STATES MAGISTRATE JUDGE
23 Hon. Robert A. McQuaid, Jr.

24 *Early Neutral Evaluation Statements are due
25 one week prior to the hearing.*